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Attorneys for Plaintiffs
American President Lines, Ltd and
APL CO. Pte., Inc.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

AMERICAN PRESIDENT LINES, LTD., and
APL CO. Pte., LTD.,

Plaintiffs,

v.

HARTFORD FIRE INSURANCE COMPANY, a
corporation,

Defendant.

HARTFORD FIRE INSURANCE COMPANY, a
corporation,

Third Party Plaintiff,

v.

ALEXSANDR SOLOVYEV, an individual;
MTL WORLDWIDE AGENCY, INC., a
corporation,

Third Party Defendants.

No. C 05-4717 MMC

**STIPULATION FOR DISMISSAL OF
COMPLAINT; ~~PROPOSED~~ ORDER**

[F.R.C.P. 41]

The Honorable Maxine M. Chesney

TO THE COURT:

Now come Plaintiffs American President Lines, Ltd. and APL Co. Pte., Ltd. (collectively

1 “APL”) and Defendant/Third Party Plaintiff Hartford Fire Insurance Company (“Hartford”), by
2 and through their respective counsel and stipulate to the dismissal of the Complaint as follows:

3 1. The Complaint, and all causes of action therein, as between APL and Hartford,
4 shall be dismissed in its entirety with prejudice.

5 2. The Third Party Complaint of Hartford as against Aleksandr Solovyev and MTL
6 Worldwide Agency, Inc. shall be unaffected by the dismissal of the original Complaint. The
7 Court shall retain jurisdiction over the Third Party Complaint.

8 3. All parties are to bear their own costs and attorneys’ fees.
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11 DATED: September 12, 2006

LUCAS VALLEY LAW

12 By: s//
13 Mark K. de Langis
14 Attorneys for Plaintiffs
15 AMERICAN PRESIDENT LINES, LTD. &
16 APL CO. PTE., INC.

17 DATED: September __, 2006

BIEDERMAN & ASSOCIATES

18
19 By: _____
20 Sharon R. Biederman
21 Attorneys for Defendant and
22 Third Party Plaintiff
23 HARTFORD FIRE INSURANCE CO.
24
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9

10

11 DATED: September __, 2006

LUCAS VALLEY LAW

12

By: s/ _____
Mark K. de Langis

13

14 Attorneys for Plaintiffs
AMERICAN PRESIDENT LINES, LTD. &
15 APL CO. PTE., INC.

16

17 DATED: September 7, 2006

BIEDERMAN & ASSOCIATES

18

19 By: 
Sharon R. Biederman

20

21 Attorneys for Defendant and
Third Party Plaintiff
22 HARTFORD FIRE INSURANCE CO.

23

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STIPULATION FOR DISMISSAL

~~PROPOSED~~ ORDER

PURSUANT TO STIPULATION of counsel for all parties that have appeared in this action,

IT IS SO ORDERED that:

1. The Complaint, and all causes of action therein, as between APL and Hartford, shall be dismissed in its entirety with prejudice.

2. The Third Party Complaint of Hartford as against Aleksandr Solovyev and MTL Worldwide Agency, Inc. shall be unaffected by the dismissal of the original Complaint. The Court shall retain jurisdiction over the Third Party Complaint.

3. All parties are to bear their own costs and attorneys' fees.

Dated: September 13, 2006


UNITED STATES DISTRICT JUDGE